

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In Re:) Case No.
Samuel NMN Quinones,) 13-40933-can13
Elizabeth Ortega Quinones,)
)
Debtors.)

**DEBTORS' MOTION FOR ENTRY OF CHAPTER 13 DISCHARGE DUE TO PLAN
COMPLETION AND NOTICE OF DEADLINE AND OPPORTUNITY TO OBJECT**

Come now the debtors and move for entry of an Order of Discharge for which the debtors are eligible under all applicable Bankruptcy laws and rules.

The debtors' completed Plan does not provide that the debtors will make any direct payments to creditors. If the debtors' completed Plan provides that the debtors will make direct payments to creditors, the debtor ☐ has or ☐ has not made all such direct payments as set forth in the Plan. [If the debtors have not made any direct payments as required by the plan, provide details of the missed payments, including number and total amount of missed payments and the creditor(s) involved on an attached sheet.]

Proof of Debtors' completion, after the filing of this case, of the Personal Financial Management course required by 11 U.S.C. §1328(g)(1) has been filed with the court.

Pursuant to 11 USC § 1328 (f), the debtors have not received a discharge in a case filed under chapter 7, 11, or 12 in the 4-year period preceding the date of the order for relief under this chapter and has not received a discharge in a case filed under chapter 13 in the 2-year period preceding the date of such order.

If the debtors have claimed a homestead exemption in excess of \$125,000, there is no proceeding pending in which the debtors may be found guilty of a felony as described in 11 USC § 522(q)(1)(A) and the debtors are not liable for a debt for the kind described in 11 USC § 522(q)(1)(B).

Pursuant to 11 USC § 1328(a), if the debtor has a Domestic Support Obligation, all amounts payable under any judicial or administrative order or by statute for domestic support obligations that were due on or before the date upon which this certification was signed, including all payments due under the plan for amounts due before the petition was filed, have been paid. The name and address of each holder of a Domestic Support Obligation is as follows:

Not Applicable

If the debtor has a Domestic Support Obligation, the debtor's most recent/current address is:

Not Applicable

If the debtor has a Domestic Support Obligation, the name and address of debtor's most

Not Applicable

WHEREFORE, the debtors respectfully move this Court to enter a Chapter 13 Discharge.

Date: May 10, 2018

Jason C. Amerine

Debtor/Debtor's Attorney

**NOTICE OF OPPORTUNITY AND DEADLINE TO OBJECT TO MOTION FOR
ENTRY OF CHAPTER 13 DISCHARGE DUE TO PLAN COMPLETION**

PLEASE TAKE NOTICE THAT WITHIN TWENTY- ONE (21) DAYS AFTER THE DATE OF THIS NOTICE you must file and serve a written objection to the motion. The objection must be filed electronically with the Bankruptcy Court at www.ecf.mowb.uscourts.gov. If you are a pro se creditor, you may file a written objection with the Clerk, United States Bankruptcy Court, Western District of Missouri, 400 E. 9th Street, Room 1510, Kansas City, MO 64106. Debtor's attorney and trustee will receive electronic notice when the objection is filed. If the debtor is pro se, you must serve your objection on the debtor.

IF YOU FAIL TO FILE A TIMELY OBJECTION, THE MOTION MAY BE GRANTED BY THE COURT WITHOUT A HEARING. The court may grant the motion without a hearing if the objection filed states inadequate grounds for denial.

Date: May 10, 2018

Jason C. Amerine

Debtor/Debtor's Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion and Notice has been served by first class mail on all creditors and parties requesting notice.

Date: May 10, 2018

/s/Jason C. Amerine

Jason C. Amerine, #50857

811 Grand Blvd., Ste 101

Kansas City, MO 64106

Phone: 816-842-6200

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Mo-ecf@castlelaw-kc.com

Instructions: Fill in all required information and serve on all creditors.

ECF Event: Bankruptcy>Motions/Applications/Requests>Chapter 13 Discharge